

Western Digital Technologies, Inc.  
Serial Number: 09/676,633

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Patent  
Docket: K35A0670

### REMARKS

#### Claim Rejections - 35 USC §103

The examiner rejected claims 1-5,18-24, 37 and 38 under 35 USC §103(a) as unpatentable over Varian (5,392,289) in view of the examiner taking official notice. The examiner asserts that Varian discloses a pseudo-random sequence generator and encoder/decoder, and the examiner takes official notice that using a unique ID and hard disk drive in the manner recited in the claim is very well known in the art. The applicant respectfully disagrees.

Although Varian discloses a pseudo-random sequence generator (PN generator 800 in FIG. 2) and an encoder (randomizer 900 in FIG. 2) and decoder (derandomizer 900 in FIG. 3), Varian does not disclose or suggest to use these components in the manner taught by the applicant. In particular, Varian does not disclose to generate the pseudo-random sequence in response to a unique ID identifying the host (the digital video recorder). In contrast, Varian discloses to generate the pseudo-random sequence in response to a fixed vector (element 250 in FIG. 2) so that the pseudo-random sequence is the same across all hosts.

Further, Varian does not disclose or suggest to use the pseudo-random sequence to encode plaintext entries of a file system into encrypted file system entries stored on the hard disk drive. Referring to page 12, lines 10-16, of applicant's specification:

"Because the file system entries 10 are stored in encrypted form relative to the unique ID 4 assigned to the DVR 2, the encrypted video programs 8 stored on the HDD 6 cannot be decrypted by connecting the HDD 6 to another DVR or to a PC. In effect, the HDD 6 is married to the host circuitry 12 of the DVR 2 through the unique ID 4 which protects against unauthorized copying. In addition, the encrypted file system entries 10 are

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transparent to the operation of the HDD 6 so that any conventional HDD 6  
may be employed without modification.”

Nothing in Varian discloses or suggests the above benefit, or any benefit related to  
encoding file system entries using a pseudo-random sequence.

The applicant does not agree with the examiner's assertion that using a unique ID  
to generate a pseudo-random sequence for encoding file system entries is well known in  
the art. The applicant respectfully requests the examiner to identify a reference that  
discloses these limitations, or withdraw the rejections.

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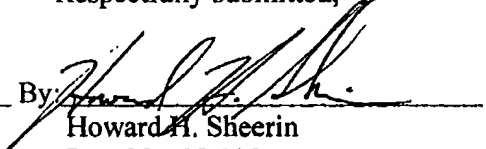
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CONCLUSION

The applicant respectfully requests the examiner to consider the above remarks in preparation for the telephone interview to be held on 07/02/04.

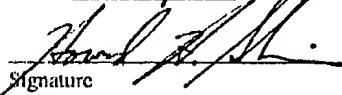
Respectfully submitted,

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